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June 6, 2022

VIA ECF

Hon. P. Kevin Castel, District Judge United States District Court Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

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ONDERO 170 Mercer LLC V. Rialto Capital Advisors, LLC, et al. Re:

Civ. No. 20-2496 (PKC)

Your Honor:

We are counsel to Plaintiff 170 Mercer LLC. This matter was settled by agreement before the Honorable Robert W Lehrburger. By Order dated April 21, 2022, the Court directed that the settlement agreement be submitted within 45 days. (We respectfully request a 15-day extension of the time to complete and submit the settlement agreement. A draft has of the settlement agreement been circulated and is being reviewed. Unfortunately, due to the last minute nature of this request, I have not consulted with Defendant's counsel as to the extension request, and Defendant's counsel is awaiting our response to their draft proposed settlement agreement.

Thank you for your continued courtesies.

Very truly yours,

Jonathan B. Schwartzman Cordova & Schwartzman, LLP

cc: K&L Gates LLP Via ECF